

**REMARKS**

In response to the Office communication dated June 27, 2005, Applicants respectfully request reconsideration.

**Objection to figures 3 and 4 under 37 C.F.R. § 1.83(a)**

Figures 3 and 4 stand objected to under 37 C.F.R. § 1.83(a) for failing to show YES and NO indications on some of decision blocks. Replacement drawing sheets with the appropriate YES and NO indications are enclosed herewith. Figure 3 has been amended by adding YES and NO indications to steps 116, 122, and 128. Figure 4 has been amended by adding YES and NO indications to steps 216, 222, and 228. Applicant respectfully asserts that the updated figures 3 and 4 comply with 37 C.F.R. § 1.83(a).

**35 U.S.C. § 112 ¶ 2 rejections**

Claims 36 and 38 stand rejected under 35 U.S.C. § 112 ¶ 2 for lack of antecedent basis. Claims 36 and 38 have been amended to depend from claim 35 and 37, respectively. Applicant respectfully asserts that claims 36 and 38 satisfy 35 U.S.C. § 112 ¶ 2.

**35 U.S.C. § 102(e) rejections**

Claims 23-25 and 31-33 stand rejected under 35 U.S.C. § 102(e) in view of U.S. Pat. 6,604,090 (Tackett). Applicant respectfully asserts that these claims are patentable in view of Tackett.

**Claims 23 and 31**

Regarding independent claims 23 and 31, Tackett does not teach, disclose, suggest, or make obvious at least the assigning, or means for assigning, a value to a pronoun information field as recited in independent claims 23 and 31, respectively. Tackett discusses a system that requires pre-programming by a user regarding the mapping between a noun and an associated pronoun. (Col. 52, l. 62-63). Once the pre-

programming is accomplished, the mapping from a particular pronoun to a noun is fixed, regardless of an amount of use of the pronoun. In Tackett, each pronoun/noun pair is replaced as a function of a change in the topic. (Col. 52, l. 64 – Col. 53, l. 1). A pronoun replacement map (e.g., the mapping of a pronoun to a specific noun) is not assigned a value based on a response by a user or usage of the pronoun. Independent claim 23, however, recites a method of establishing pronoun information related to a noun identifier, with the method including assigning a pronoun information field a value as a function of a response by the user. Independent claim 31 recites a system for establishing a pronoun preference for a noun identifier with the system including means for searching a pronoun information database for historical information including number and gender information, returning a pronoun preference result as a function of said search of said pronoun information database, and means for assigning a pronoun preference field a value indicative of the pronoun preference result. For at least these reasons, independent claims 23 and 31 are patentable over Tackett.

Claims 24-25 and 32-33

Dependent claims 24-25 and 32-33 are also patentable in view of Tackett. These claims depend from independent claims 23 and 31, respectively, and are thus patentable for at least the reasons discussed above with respect to independent claims 23 and 31.

35 U.S.C. § 103(a) rejections

Claim 34

Dependent claim 34 stands rejected under 35 U.S.C. § 103(a) as being unpatentable in view of Tackett and the Official Notice taken by the Examiner. This claim depends from claim 31. The official notice taken by the Examiner does not overcome the deficiencies noted above with respect to Tackett and thus, claim 34 is patentable for at least the reasons discussed above with respect to independent claim 31.

Claims 27-30 and 35-38

Dependent claims 27-30 and 35-38 stand rejected under 35 U.S.C. § 103(a) in view of Tackett in view of an article written by Lappin *et. al.* (“An algorithm for Pronominal Anaphora Resolution”). These claims depend from independent claims 23 and 31, respectively. The Examiner does not assert that Lappin overcomes the

deficiencies noted above with respect to Tackett and thus, for at least the reasons discussed above with respect to claims 23 and 31, dependent claims 27-30 and 35-38 are patentable over Tackett and Lappin.

Claims 1-22, 39, and 40

Claims 1-22, 39, and 40 stand rejected under 35 U.S.C. § 103(a) in view of Tackett in view of U.S. Pat. No. 5,265,014 (Haddock). Applicants respectfully assert that these claims are patentable in view of Tackett in view of Haddock.

Claim 1

Tackett, either alone, or in view of Haddock, does not teach, disclose, suggest, or make obvious at least the updating pronoun information as a function of a successful selection of a historical noun reference as recited in independent claim 1. Tackett discusses a system that requires pre-programming by a user regarding the mapping between a noun and an associated pronoun. (Col. 52, l. 62-63). Once the pre-programming is accomplished, the mapping from a particular pronoun to a noun is fixed, regardless of usage of the pronoun to select an associated noun. Claim 1, however, recites a method of interpreting a pronoun including recognizing a pronoun, comparing the recognized pronoun to pronoun information associating historical noun references with pronoun number and gender information, selecting one of the historical noun references based on the comparison, and updating the pronoun information as a function of a successful selection of the historical noun reference. Thus, information used to select a noun based on a recognized pronoun is updated, while Tackett discusses a fixed mapping. Further, the Examiner cited Haddock for discussing a history of a dialog, but neither Tackett nor Haddock, alone or in combination, teach, disclose, suggest, or make obvious the recited updating. Thus, for at least these reasons, independent claim 1 is patentable in view of Tackett in view of Haddock.

Claim 6

Tackett, either alone, or in view of Haddock, does not teach, disclose, suggest, or make obvious at least means for updating pronoun information as a function of a successful selection of a historical noun reference as recited in independent claim 6. Tackett discusses a system that requires pre-programming by a user regarding the mapping between a noun and an associated pronoun. (Col. 52, l. 62-63). Once the pre-

programming is accomplished, the mapping from a particular pronoun to a noun is fixed, regardless of usage of the pronoun to select an associated noun. Claim 6, however, recites an apparatus for interpreting a pronoun including a recognizer adapted to recognize a pronoun, means for comparing the recognized pronoun to a historical listing of noun references including information associating the historical noun references with pronoun number and gender information, means for selecting one of the noun references as a function of the comparison, and means for updating the pronoun information as a function of a successful selection of one of the noun references. Thus, information used to select a noun based on a recognized pronoun is updated, while Tackett discusses a fixed mapping. Further, the Examiner cited Haddock for discussing a history of a dialog, but neither Tackett nor Haddock, alone or in combination, teach, disclose, suggest, or make obvious the recited updating. Thus, for at least these reasons, independent claim 6 is patentable in view of Tackett in view of Haddock.

#### Claims 2-5 and 7-10

Dependent claims 2-5 and 7-10 are also patentable in view of Tackett in view of Haddock. These claims depend from independent claims 1 and 6, respectively, and are thus patentable for at least the reasons discussed above with respect to independent claims 1 and 6.

#### Claim 11

Tackett, either alone, or in view of Haddock, does not teach, disclose, suggest, or make obvious at least the updating pronoun information as a function of a successful selection of a record as recited in independent claim 11. Tackett discusses a system that requires pre-programming by a user regarding the mapping between a noun and an associated pronoun. (Col. 52, l. 62-63). Once the pre-programming is accomplished, the mapping from a particular pronoun to a noun is fixed, regardless of usage of the pronoun to select an associated noun. Claim 11, however, recites a method of interpreting a pronoun in a voice user interface including recognizing a pronoun in a user utterance, comparing the recognized pronoun to pronoun information associating historical noun references with pronoun number and gender information, selecting a record corresponding to the historical noun references as a function of the comparison, and updating the pronoun information as a function of a successful selection of the record.

Thus, information used to select a noun based on a recognized pronoun is updated, while Tackett discusses a fixed mapping. Further, the Examiner cited Haddock for discussing a history of a dialog, but neither Tackett nor Haddock, alone or in combination, teach, disclose, suggest, or make obvious the recited updating. Thus, for at least these reasons, independent claim 11 is patentable in view of Tackett in view of Haddock.

Claim 17

Tackett, either alone, or in view of Haddock, does not teach, disclose, suggest, or make obvious at least means for updating pronoun information as a function of a successful selection of a historical noun reference as recited in independent claim 17. Tackett discusses a system that requires pre-programming by a user regarding the mapping between a noun and an associated pronoun. (Col. 52, l. 62-63). Once the pre-programming is accomplished, the mapping from a particular pronoun to a noun is fixed, regardless of usage of the pronoun to select an associated noun. Claim 17, however, recites an apparatus for interpreting a pronoun in a voice user interface including a recognizer adapted to recognize a pronoun in a user input, a historical listing including pronoun information associating historical noun references with pronoun number and gender information, means for comparing the recognized pronoun to the pronoun information, means for selecting a record corresponding to one of the historical noun references, and means for updating the pronoun information as a function of a successful selection of the historical noun reference. Thus, information used to select a noun based on a recognized pronoun is updated, while Tackett discusses a fixed mapping. Further, the Examiner cited Haddock for discussing a history of a dialog, but neither Tackett nor Haddock, alone or in combination, teach, disclose, suggest, or make obvious the recited updating. Thus, for at least these reasons, independent claim 17 is patentable in view of Tackett in view of Haddock.

Claims 12-16 and 18-22

Dependent claims 12-16 and 18-22 are also patentable in view of Tackett in view of Haddock. These claims depend from independent claims 11 and 16, respectively, and are thus patentable for at least the reasons discussed above with respect to independent claims 11 and 16.

Applicant respectfully disagrees with the Examiner's Official Notice that "taking counts of successful implementation" is well known in the art. Applicant respectfully requests that the Examiner produce authority for this statement in accordance with M.P.E.P. § 2144.03(C).

#### Claims 39 and 40

Independent claims 39 and 40 are patentable over Tackett in view of Haddock. As discussed above, Tackett discusses a system that requires pre-programming by a user regarding the mapping between a noun and an associated pronoun. (Col. 52, l. 62-63). Once the pre-programming is accomplished, the mapping from a particular pronoun to a noun is fixed, regardless of usage of the pronoun to select an associated noun. Thus, Tackett in view of Haddock does not teach, disclose, suggest, or make obvious a system, as recited in independent claim 39, providing for user interaction including means for comparing a recognized pronoun to pronoun information associated with a historical noun reference, the pronoun information including pronoun number and gender information, and means for updating said pronoun information as a function of a successful selection of said historical noun reference. Nor does Tackett in view of Haddock teach, disclose, suggest, or make obvious a system, as recited in independent claim 40, providing for user interaction including a pronoun cross-reference associating pronoun information with at least one noun reference in a historical list, the pronoun information including pronoun number and gender information, and a second subsystem configured to update said pronoun information as a function of a successful selection of said historical noun reference.

#### Claim 41

Claim 41, which depends from independent claim 23, has been added. Applicant believes that no new matter has been introduced by claim 41.

#### Conclusion


Based on the foregoing, this application is believed to be in allowable condition, and a notice to that effect is respectfully requested. If a telephone conversation with

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Applicant's representative would help expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at (617) 542-6000.

Please apply any charges not covered, or any credits, to Deposit Account 50-0311, Reference No. 23484-016 UTIL.

Respectfully submitted,



Shane H. Hunter/Registration No. 41,858

Kyle Turley, Registration No. 57,197

Attorneys/Agents for Applicants

Mintz, Levin, Cohn, Ferris,

Glovsky and Popeo, P.C.

**Customer Number 30623**

Telephone 617/348-1765

Facsimile 617/ 542-2241

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